

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

In re: SUBPOENA TO RAPE ABUSE ) CIVIL NO.:  
AND INCEST NATIONAL NETWORK ) 24-0073-ACR  
)  
PLAINTIFF'S STEERING COMMITTEE, )  
)  
Petitioner, )  
vs. )  
)  
RAPE ABUSE AND INCEST NATIONAL, )  
NETWORK, ) August 6, 2024  
Respondent. ) Washington, D.C.  
\_\_\_\_\_ ) 2:00 p.m.

Transcript of Motions Hearing  
Before the Honorable Ana C. Reyes  
United States District Judge

APPEARANCES:

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by computer-aided transcription

## P R O C E E D I N G S

THE CLERK: Case 24-73 Plaintiff's Steering  
Committee versus Rape and Incest Abuse National Network.

Counsel, please approach the podium and state your  
name for the record, starting with plaintiff's counsel.

MS. GOLDENBERG: Good afternoon, Your Honor.  
Marlene Goldenberg on behalf of the Plaintiff's Steering  
Committee.

THE COURT: Good morning -- good afternoon.

MS. GOLDENBERG: Whatever it is.

MR. SULLIVAN: Good afternoon, Your Honor. My name  
is John Sullivan, I'm not making an appearance today, but  
Mr. Adelman he is a few blocks --

THE COURT: Are you an attorney?

MR. SULLIVAN: Yes, I am.

THE COURT: Are you an attorney for RAINN?

MR. SULLIVAN: I'm not making an appearance. I'm  
here to --

THE COURT: I'm asking if you're an attorney for  
RAINN.

MR. SULLIVAN: I'm not an attorney for RAINN in this  
court --

THE COURT: Why are you here?

MR. SULLIVAN: I'm assisting Mr. Adelman in taking  
notes just --

1 THE COURT: Are you an attorney?

2 MR. SULLIVAN: Yes.

3 THE COURT: Who is your client?

4 MR. SULLIVAN: It would be RAINN, but I --

5 THE COURT: Okay. Well, then you're up. We start  
6 at 2:00 --

7 MR. SULLIVAN: Your Honor --

8 THE COURT: No. We are starting and you're a lawyer  
9 and so sit down, we're going.

10 MR. SULLIVAN: Your Honor --

11 THE COURT: Sit down. We're going.

12 Up. First off, in the future, pro hac vice  
13 applications are not sort of "do them if you want." All  
14 right. Your first filing had a bunch of pro hacs that weren't  
15 made. And then my clerk called to find out what was going on.  
16 And the answer was, well, this is just like -- we just want  
17 you to transfer this, so we're not going to be here long  
18 enough for us new pro hacs. In the future do not assume what  
19 I'm going to do. And even if you were just going to be here  
20 for a minute, if there's a filing, there's a pro hac vice  
21 process, we need to follow it, okay?

22 MS. GOLDENBERG: Understood, Your Honor.

23 THE COURT: All right. Secondly, I'm not  
24 transferring the case. We're going to this settled today.

25 MS. GOLDENBERG: Okay.

1 THE COURT: Third, I'm not going to argue or hold  
2 that they waived their objections because whatever, I'm not  
3 going to hold that. You can be seated.

4 You. All right. I am not going to quash the  
5 subpoena. And we are going to all figure out what you guys  
6 are going to agree to today, because we are not leaving here  
7 until you guys produce something, because it is totally  
8 inappropriate not to agree to produce any documents.

9 Now, have you two had actual or have you all had  
10 actual meet and confers about what documents would get put  
11 over?

12 MR. SULLIVAN: I have not personally. Mr. Adelman  
13 has. And he is a few blocks away --

14 THE COURT: I don't care how many blocks away he is.  
15 He's not here at 2:00. So do you know what the meet and  
16 confers have been?

17 MS. GOLDENBERG: I do, Your Honor.

18 THE COURT: All right. Come on up.

19 MS. GOLDENBERG: The short answer to your question  
20 is no, there haven't been substantive meet and confers. RAINN  
21 hasn't responded. We did argue some third party subpoena  
22 motions out in the MDL. And based on the Court's rulings have  
23 narrowed our subpoena, sent narrower requests to RAINN last  
24 week, and have not heard back.

25 THE COURT: Okay. Why haven't they heard back?

1 Come on up. Why haven't they heard back in a week?

2 Especially, since we were doing this before a conference that  
3 I had to get ready for.

4 MR. SULLIVAN: Your Honor, we have been speaking, we  
5 have been --

6 THE COURT: Well, she just told me you haven't  
7 been.

8 MR. SULLIVAN: And if I may, I am not an attorney  
9 who is admitted in the District of Columbia.

10 THE COURT: I don't care. I'm letting you -- you're  
11 in the well of my courtroom and I'm letting you speak.

12 MR. SULLIVAN: Understood. We have been going back  
13 and forth. And I understand that --

14 THE COURT: Well, why is she telling me that they  
15 haven't heard from you in a week?

16 MR. SULLIVAN: We have -- we did receive some  
17 proposed changes to that --

18 THE COURT: Okay. What was the response?

19 MR. SULLIVAN: From what I understand it is still --  
20 that is still ongoing.

21 THE COURT: How is it ongoing and you guys knew you  
22 had a hearing in front of me today? Have you responded to the  
23 thing that they gave you a week ago?

24 MR. SULLIVAN: Your Honor, I have not had  
25 personally -- not personally worked on that response

1 specifically, Your Honor. And I am --

2 THE COURT: Okay. What were the narrowed topics  
3 that you gave?

4 MS. GOLDENBERG: In short, Your Honor, what we're  
5 asking for are documents related to two things; one the Safety  
6 Advisory Committee and two --

7 THE COURT: Safety Advisory Committee at Uber?

8 MS. GOLDENBERG: At Uber that RAINN played a role  
9 on. And the second thing are documents related to the  
10 development of Uber's taxonomy, which is how they describe  
11 different types of sexual abuse. And Uber's publicly  
12 available U.S. safety reports, which are also part of our  
13 subpoena, detail that RAINN was part of the process of  
14 developing both the taxonomy as well as putting together the  
15 safety report. And that's --

16 THE COURT: That's from the Safety Advisory  
17 Committee?

18 MS. GOLDENBERG: I'm sorry.

19 THE COURT: From the Safety Advisory Committee?

20 MS. GOLDENBERG: Those played a role in the final  
21 product of the U.S. safety report. And we don't know exactly  
22 how it worked, because we don't have their documents. But  
23 what we are aware of is that they were involved in the Safety  
24 Advisory Committee and the final safety report and the  
25 development of the taxonomy.

1 THE COURT: Okay. When I start at 2:00, I start at  
2 2:00, I don't start at 2:03, I don't start at 2:05, I don't  
3 start at 2:10. If you're ten minutes early, you're 15 minutes  
4 late. And right now you're actually late.

5 MR. ADELMANN: I apologize, Your Honor. Sincere  
6 apologies.

7 THE COURT: What caused you to be late?

8 MR. ADELMANN: Your Honor, my office is in Virginia.  
9 I was over here at 1:30 and I was looking for parking. I  
10 turned around on the D Street underpass and accidentally went  
11 down 395 --

12 THE COURT: All right. All right. She says that  
13 she sent you all narrowed requests last week and she hasn't  
14 heard back from you all.

15 MR. ADELMANN: That is correct, Your Honor.

16 THE COURT: Come on up. Make an appearance and come  
17 on up.

18 MR. ADELMANN: Good morning, Your Honor, Sam -- good  
19 afternoon, excuse me, Sam Adelmann from Maguire Woods on  
20 behalf of the nonparty RAINN. Your Honor, I did receive  
21 Ms. Hoefs' email, I -- it took a while to get a hold of my  
22 client. I discussed it with my client just yesterday and was  
23 prepared to respond today.

24 THE COURT: Did you think maybe it would be good to  
25 respond to her before I had to call this status conference and

1 prepare for it.

2 MR. ADELMANN: Your Honor, I did my level best to  
3 get a hold of my client and discuss the limited terms --

4 THE COURT: What is the response? Are you going to  
5 give her the narrowed subpoena documents?

6 MR. ADELMANN: Well, I think, Your Honor -- I mean,  
7 we did want to be heard on the opposition of the motion to  
8 transfer.

9 THE COURT: Well, you're late and I already denied  
10 it.

11 MR. ADELMANN: Understood, Your Honor. I'm happy to  
12 speak with Ms. Hoefs in the hallway --

13 THE COURT: We're going to get this squared away  
14 right now. What is your response on her narrowed request?

15 MR. ADELMANN: Your Honor, we still believe that  
16 it's overly broad and unduly burdensome.

17 THE COURT: What's overly broad? Let's take them  
18 one at a time. The Safety Committee documents, and what  
19 documents exactly do you want?

20 MS. GOLDENBERG: What we'd like are the documents  
21 that show the role that RAINN played on Uber's Safety Advisory  
22 Committee.

23 THE COURT: Okay. And I'm sure you're happy for  
24 documents sufficient to show; right?

25 MS. GOLDENBERG: Yes.

1 THE COURT: All right. That's not overly broad.  
2 You're producing that. Second?

3 MS. GOLDENBERG: Second, we'd like the documents  
4 relating to the development of Uber's taxonomy.

5 THE COURT: Okay. All documents or documents  
6 sufficient to show?

7 MS. GOLDENBERG: I mean, I think this is an all  
8 documents request, because documents sufficient to show would  
9 really just give us definitions for what the taxonomy is,  
10 that's available already. What we need to know is  
11 specifically how they decided what was going to count and what  
12 wasn't.

13 THE COURT: Okay. What's the response on that?

14 MR. ADELMANN: Your Honor, I think that the response  
15 sort of globally here is the burden it would be on my client  
16 to --

17 THE COURT: You're a third party, this is not --  
18 we're not playing the burden game. Okay. I litigated for 22  
19 years, this is not burdensome. And frankly, you missed the  
20 lecture, I gave her a lecture, your lecture was saying no  
21 documents whatsoever was totally inappropriate to this  
22 subpoena. Which is why I'm super annoyed at both of you for  
23 not having met and conferred much earlier on the actual  
24 substance, even if you were going to disagree on the transfer  
25 or the whatever.

1 But specific to the request that she just gave, what  
2 is the overbroad objection there, because she's narrowed a  
3 subpoena that was way overbroad, 11, 12 or 13 areas to just  
4 two. The first is not broad at all. The second maybe, but  
5 tell me why that's particularly burdensome.

6 MR. ADELMANN: Well, Your Honor, I still see that  
7 there's 12 requests even in the narrowed subpoena, but as  
8 to --

9 THE COURT: I thought you just told me there were  
10 only two requests?

11 MS. GOLDENBERG: I apologize, I was paraphrasing.  
12 But basically what it boils down to is that. And we're happy  
13 to go with what I put on the record.

14 THE COURT: Okay. Good. You've got it narrowed to  
15 two.

16 MR. ADELMANN: Well, if it's narrowed to two then --

17 THE COURT: We have documents sufficient to show the  
18 role that you all played on the Safety Advisory Committee. I  
19 am confident that that's very easy for you to get to them;  
20 right?

21 MR. ADELMANN: Yes, Your Honor.

22 THE COURT: Okay. And No. 2 is, you want to say  
23 that again for the record?

24 MS. GOLDENBERG: And I want to clarify that, I guess  
25 there's 2A and B, because we didn't talk about the safety

1 report. But the two that we just talked about is the  
2 development of Uber's taxonomy, which goes into the safety  
3 report. So we can call it 2, I guess.

4 THE COURT: Okay. I just want to be absolutely  
5 clear what we're dealing with. No. 1 is documents sufficient  
6 to show RAINN's involvement on the Safety -- on the Uber  
7 Safety Advisory Committee.

8 MS. GOLDENBERG: Correct, Your Honor.

9 THE COURT: All right. And I assume if there's no  
10 clean document you're happy to get a letter from them or  
11 something from them telling them what it is; right?

12 MS. GOLDENBERG: My understanding is that there are  
13 going to be meeting minutes that show us precisely what that  
14 role was. And that's the type of document we envisioned  
15 getting. Again, I don't know what they have, but that's my  
16 guess.

17 THE COURT: Okay. Well, he's going to give you a  
18 document sufficient to show what the role was. It's not going  
19 to be expansive. And if he represents to you that he doesn't  
20 have that kind of document, then he's going to -- you guys are  
21 going to figure out some way that he's going to tell you what  
22 it is in writing. And then you can have it like an  
23 interrogatory even though he's a third party, okay?

24 MS. GOLDENBERG: Understood.

25 THE COURT: All right. Your second request is

1 documents regarding how the taxonomy report -- how the  
2 taxonomy was created for the safety report.

3 MS. GOLDENBERG: Correct. And then the role that  
4 RAINN played with the safety report as well.

5 THE COURT: Okay. Well, I just want to take them  
6 each separately. So let's start with the second one. All  
7 right. Documents relating to how the taxonomy categories were  
8 put together. What is that yay, nay, what do we have?

9 MR. ADELMANN: Your Honor, I guess my objection --  
10 my only objection to that would be -- and perhaps this could  
11 be dealt with with a protective order that may already be in  
12 place in the MDL, but I don't know to what extent the taxonomy  
13 was specific to Uber or was something proprietary that RAINN  
14 has developed and used with other clients, in which case I  
15 would claim that there's some proprietary, confidential  
16 interest there.

17 MS. GOLDENBERG: We have a protective order in the  
18 MDL. Happy to have it apply to these documents as well. And  
19 Uber's U.S. safety report says that it is publicly available  
20 that RAINN was involved in developing the taxonomy, at least  
21 as it relates to Uber. We don't need documents relating to  
22 other people.

23 THE COURT: All right. So good?

24 MR. ADELMANN: Yes, Your Honor.

25 THE COURT: All right. When you say all documents,

1 he doesn't have to search every nook and cranny --

2 MS. GOLDENBERG: No.

3 THE COURT: Okay? He's going to take one or two  
4 relevant individuals, look at their emails, and go to whatever  
5 shared drive there is; right?

6 MS. GOLDENBERG: I've just finished two days of  
7 search term and custodian negotiations. I'm certainly happy  
8 to meet and confer separately with him and make sure that  
9 happens.

10 THE COURT: Okay. All right. And then the third --  
11 go ahead.

12 MR. ADELMANN: I'm happy to meet and confer. I  
13 would just like, if appropriate from the Court, you know, some  
14 limitation around that, whatever the Court deems appropriate.  
15 I mean, part of our position today was that -- and if I may,  
16 you know, my client's received two other subpoenas from state  
17 court JCCP, another coordinated action identical to these  
18 requests. And in meeting conferring on that my client has  
19 discovered there's about 40 custodians that may be responsible  
20 for communications with Uber. And that would be overly  
21 burdensome. So I do --

22 THE COURT: Okay. You get five. You get five  
23 custodians.

24 MS. GOLDENBERG: Sure.

25 MR. ADELMANN: Thank you, Your Honor.

1 THE COURT: They get five.

2 MR. ADELMANN: Thank you.

3 THE COURT: They don't get anymore than five. You  
4 get to choose the five. They better be the actual core five.  
5 Because if she comes back and tells me that you guys played  
6 games, then she's going to get 40.

7 MR. ADELMANN: Understood.

8 THE COURT: Okay. All right. And then what's the  
9 third -- and that's for all of these. What's the third issue?

10 MS. GOLDENBERG: The third is RAINN's role in the --

11 THE COURT: Oh, and I'm sorry, yes, you can -- sign  
12 the protective order, file it in this court, because I'll have  
13 jurisdiction over things. But just use the whatever  
14 protective order they used in the MDL. I'm sure that will be  
15 fine for you. If not, let me know.

16 MR. ADELMANN: Yes.

17 MS. GOLDENBERG: Understood.

18 THE COURT: What's the third thing?

19 MS. GOLDENBERG: The last thing is RAINN's role with  
20 the Uber U.S. safety report.

21 THE COURT: Is that different than the Safety  
22 Advisory Committee?

23 MS. GOLDENBERG: It is. The safety report is a  
24 document that was publicly made available by Uber. They've  
25 had two of them that have covered the number and nature of

1 sexual assaults that took place in Ubers. And, obviously,  
2 there was a lot that went into creating that document. RAINN  
3 was one of the outside organizations that helped Uber consult  
4 on putting that together.

5 THE COURT: Okay. That's another document  
6 sufficient to show; right?

7 MS. GOLDENBERG: No, that's an all documents  
8 request, but we understand the confines you just gave us with  
9 custodians --

10 THE COURT: Well, no, hold on. Hold on. You just  
11 told me documents -- you need to know what the role was, why  
12 is that not just a document sufficient to show.

13 MS. GOLDENBERG: Not just their role, but the  
14 selections that were made with RAINN's assistance.

15 THE COURT: Okay. Well, that's not what you just  
16 said. I'm trying to be really specific here so that we're not  
17 coming back and doing this again.

18 MS. GOLDENBERG: No, I appreciate that.

19 THE COURT: Because that guy is freaked out over  
20 there and he doesn't want to have to be in front of me  
21 again.

22 MS. GOLDENBERG: I apologize if I was inarticulate  
23 and thanks for clarifying.

24 THE COURT: Okay. So with respect to what their  
25 role was, let's just take that, that's just a document

1 sufficient to show; right? Just put aside the other stuff  
2 that you want.

3 MS. GOLDENBERG: Yes.

4 THE COURT: All right. So a document sufficient to  
5 show what RAINN's role was in the Safety Advisory Report.  
6 Same issue if there's not a document on it, you guys figure  
7 out some way to get that information to them in a way that  
8 they can use, okay?

9 MR. ADELMANN: Understood, Your Honor.

10 THE COURT: All right. Now what's the fourth thing  
11 you want?

12 MS. GOLDENBERG: It's really tied to that. So the  
13 decisions that RAINN helped Uber make for the U.S. safety  
14 report; what went in, how was it classified, really just those  
15 two things. And that's more of an all documents request,  
16 because we don't know exactly what decisions were made or how  
17 they were formed.

18 THE COURT: All right. Do you know from based on  
19 your are JCCP meet and confers how wide that area is?

20 MR. ADELMANN: I don't know that that's going to be  
21 contain -- I mean, the role, the advice that they gave as to  
22 safety reports I don't think is going to be contained in a  
23 finite number of documents. If they want the safety reports,  
24 we can produce those.

25 THE COURT: No, no, they want to know how you went

1 into deciding what the categories were going to be.

2 MR. ADELMANN: So I think if the Court would make it  
3 documents sufficient to show, then we can determine if  
4 there's, you know, a limited number of documents --

5 THE COURT: Actually, one second. How is what they  
6 did in the safety report different from how they decided what  
7 the taxonomy -- wasn't the taxonomy what the safety report  
8 used to get their numbers? I know all this because I  
9 represented Lyft forever on these issues.

10 MS. GOLDENBERG: Yeah, so they're closely tied, but  
11 they're not exactly the same. So the taxonomy, as you  
12 correctly stated, is basically how they classified sexual  
13 assaults, right. But then the safety report took it one step  
14 further. There were decisions made about what type of sexual  
15 assault was counted. And there was work done on the back end  
16 to decide, okay, we're looking at this report, this one  
17 counts, this one doesn't. So there's a decision-making  
18 process behind the scenes that isn't available to us from  
19 reading the public --

20 THE COURT: I'm sorry, this one does or doesn't  
21 count, that goes into how the taxonomy report was created.

22 MS. GOLDENBERG: The -- I think we're just --  
23 there's a semantics issue. So the publicly available document  
24 is called the U.S. safety report.

25 THE COURT: Right.

1 MS. GOLDENBERG: The taxonomy is the classification  
2 criteria for the sexual assault.

3 THE COURT: Right.

4 MS. GOLDENBERG: So the U.S. safety report describes  
5 the taxonomy. And I think what we really want for the  
6 document portion of our request, just to get this down to  
7 brass tax, is we want to know how the safety report was  
8 created. How did they decide what the taxonomy criteria were.  
9 How did they decide what was going to be included and excluded  
10 from the U.S. safety report. That's what it boils down to.

11 THE COURT: Okay. Why isn't that all -- why can't  
12 you get that part from Uber?

13 MS. GOLDENBERG: We can get some of it from Uber,  
14 but because RAINN was hired on as an outside consultant  
15 they're going to have internal documents that never went to  
16 Uber.

17 THE COURT: Well, why are those relevant?

18 MS. GOLDENBERG: I'm sorry?

19 THE COURT: Why are those relevant? I mean, at the  
20 end of the day the only thing that's going to be relevant to  
21 you is the decisions that Uber made.

22 MS. GOLDENBERG: Well, not necessarily, because if  
23 RAINN was to make a recommendation that Uber chose not to  
24 accept, that's going to be relevant to our case. RAINN was  
25 brought on --

1 THE COURT: Well, if there's -- if you find a  
2 recommendation that RAINN made that Uber didn't follow, then  
3 you can come back to me. But I'm not going to have them go on  
4 a wild goose chase about this particular -- the taxonomy  
5 report I understand, that is key to you all trying to attack  
6 the report. I'm on board. You're going to get five  
7 custodians on that. I'm not going to send them on a wild  
8 goose chase on if they made a recommendation and Uber didn't  
9 follow it. If that ends up being the case, come back to me  
10 and I'll think about it again. But at the end of the day, if  
11 they made a recommendation and Uber didn't follow it, you  
12 really don't need much more than that. I mean, that is prima  
13 facie, you would argue, bad. And if they really, really meant  
14 it, that's not going to be any worse for you than if they kind  
15 of meant it. They made the recommendation.

16 MS. GOLDENBERG: Certainly, and that's just what  
17 we'd like to know is if the recommendation was made,  
18 presumably that's a document that RAINN has that --

19 THE COURT: Well, if the recommendation was made  
20 then Uber will have the document or you'll be able to depose  
21 their people.

22 MS. GOLDENBERG: Hopefully. We're not sure. But  
23 understood.

24 THE COURT: You're definitely going to get Uber  
25 depositions.

1 MS. GOLDENBERG: We're certainly going to have Uber  
2 depositions. We have separate issues with Uber where they  
3 have refused to produce custodians on certain issues. And  
4 because of that had a hearing in the MDL where the judge ruled  
5 we don't have to get everything from Uber or wait to see if we  
6 get it from Uber before we go elsewhere, which is why we're  
7 here. But I understand and respect your ruling. We'll take  
8 it and we'll come back if we need to.

9 THE COURT: All right. Does that solve all your  
10 issues?

11 MR. ADELMANN: Understood, Your Honor. Yes.

12 THE COURT: All right. Anything else?

13 MS. GOLDENBERG: No. Thanks for your time, Your  
14 Honor.

15 THE COURT: Okay. I despise discovery disputes. I  
16 think most of them, if not all of them, should be figured out  
17 amongst the parties. I realize it's a somewhat odd posture,  
18 which is why I had the hearing as opposed to just telling you  
19 all to meet and confer again, which I maybe should have done.

20 But going forward, you guys figure this stuff out.  
21 Because the next time you guys are in front of me, whoever  
22 loses is going to lose big. So in other words, if you want  
23 all documents and he loses, you're going to get all documents.  
24 If you want all documents and he wins, you're going to get  
25 zero documents going forward. Okay?

1 MS. GOLDENBERG: Understood.

2 THE COURT: All right. Thank you, everyone.

3 (The proceedings were concluded 2:18 p.m.)

4 I, Christine Asif, RPR, FCRR, do hereby certify that  
5 the foregoing is a correct transcript from the stenographic  
6 record of proceedings in the above-entitled matter.

7 /s/  
8 Christine T. Asif  
9 Official Court Reporter  
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10 7:3.	absolutely	APPEARANCES	back 4:24,
11 10:3.	11:4.	1:23.	4:25, 5:1,
12 10:3,	Abuse 1:4, 2:3,	applications	5:12, 7:14,
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13 10:3.	accept 18:24.	apply 12:18.	17:15, 19:3,
14 1:27.	accidentally	appreciate	19:9, 20:8.
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18 21:3.	actual 4:9,	appropriate	16:18.
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